

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**THERAPY PRODUCTS, INC.
d/b/a ERCHONIA MEDICAL**

88

07 CV 8696 (DLC)

Plaintiff,

8

V.

**MOTION TO ADMIT
COUNSEL PRO HAC
VICE**

**LIONEL BISSOON, M.D.,
d/b/a MESOTHERAPIE & ESTETIK,
MERIDIAN AMERICA MEDICALS, INC.
MERIDIAN MEDICAL INC., and
MERIDIAN CO., LTD.**

[ECF Case]

Defendants.

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Elliot Lipins, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

James D. Petrucci
Mason & Petrucci
4900 Woodway, Suite 745
Houston, Texas 77056
Tel: (713) 840-9993
Fax: (713) 877-9100

Robert M. Mason
Mason & Petruzzi
13601 Preston Rd., Ste. 402W
Dallas, Texas 75240
Tel: (972) 788-1500
Fax: (972) 788-1561

James D. Petrucci is a member in good standing of the Bar of the States of Texas, California, and the District of Columbia. There are no pending disciplinary proceedings against James D. Petrucci in any State or Federal court. Copies of Certificates of Good Standing for Mr. Petrucci for these states are enclosed herewith.

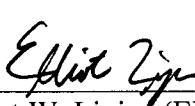
U.S. GOVERNMENT PRINTING OFFICE 1912 10-1250

Robert M. Mason is a member in good standing of the Bar of the States of Texas and Illinois. There are no pending disciplinary proceedings against Robert M. Mason in any State or Federal Court. Copies of Certificates of Good Standing for Mr. Mason for these states are enclosed herewith.

Dated: January 30, 2008

SCHWEITZER CORNMAN GROSS & BONDELL LLP
Attorneys for Plaintiff
292 Madison Avenue
19th Floor
New York, NY 10017
Telephone: (646) 424-0770
Facsimile: (646) 424-0880

By



Elliot W. Lipins (EL6151)

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

James D. Petrucci

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 14th day of December, 1990.

I further certify that the records of this office show that, as of this date

James D. Petrucci

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand
and the seal of the Supreme Court of
Texas at the City of Austin, this, the
7th day of January, 2008.

BLAKE HAWTHORNE, Clerk

by Brad Sonego

Brad Sonego, Deputy Clerk

No. 6305B



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

JAMES DANIEL PETRUZZI

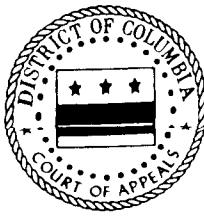
I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that JAMES DANIEL PETRUZZI was on the 3RD day of DECEMBER 1984, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his name now appears on the Roll of Attorneys as an inactive member of the bar of this state in good standing.

*Witness my hand and the seal of the court,
this 7th day of JANUARY, 2008.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By Joseph Cornetta
Joseph Cornetta, Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

James Daniel Petrucci

was on the 2nd day of August, 1989

duly qualified and admitted as an attorney and counselor. This
attorney is, on the date indicated below, voluntarily registered as
an inactive member in good standing of the District of Columbia Bar
and, therefore, is not currently eligible to practice law in the
District of Columbia.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on January
10, 2008.

GARLAND PINKSTON, JR., CLERK

By: Garrison Clark
Deputy Clerk

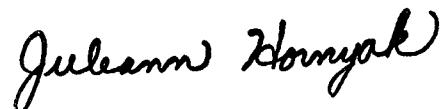
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Robert Michael Mason

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 1986 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Tuesday, January 08, 2008.



Clerk

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

ROBERT M. MASON

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 5th day of July, 1990.

I further certify that the records of this office show that, as of this date

ROBERT M. MASON

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand
and the seal of the Supreme Court of
Texas at the City of Austin, this 7th day
of January, 2008.

BLAKE HAWTHORNE, Clerk

by *Brad Sonego*
Brad Sonego, Deputy Clerk

No. 6305A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|---------------------------|
| THERAPY PRODUCTS, INC. | § | |
| d/b/a ERCHONIA MEDICAL | § | 07 CV 8696 ((DLC)) |
| § | | |
| Plaintiff, | § | DECLARATION OF |
| v. | § | ELLIOT W. LIPINS |
| § | | |
| LIONEL BISSOON, M.D., | § | IN SUPPORT OF |
| d/b/a MESOTHERAPIE & ESTETIK, | § | MOTION TO ADMIT |
| MERIDIAN AMERICA MEDICALS, INC. | § | COUNSEL PRO HAC |
| MERIDIAN MEDICAL INC., and | § | VICE |
| MERIDIAN CO., LTD. | § | [ECF Case] |
| § | | |
| Defendants. | § | |

I, Elliot Lipins, declare as follows:

1. I am an associate at Schweitzer Cornman Gross & Bondell LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit James D. Petrucci and Robert M. Mason as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known James D. Petrucci and Robert M. Mason since 2006. James D. Petrucci and Robert M. Mason are partners at Mason & Petrucci in Dallas, Texas and Houston, Texas.

4. I have found Messrs. Petruzzi and Mason to be skilled attorneys and persons with high integrity and moral character. Messrs. Petruzzi and Mason are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of James D. Petruzzi and Robert M. Mason, pro hac vice.

6. I respectfully submit a proposed order granting the admission of James D. Petruzzi and Robert M. Mason, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit James D. Petruzzi and Robert M. Mason, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

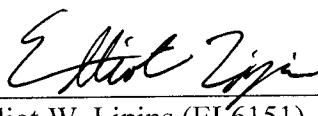
I declare under the penalty of perjury that the foregoing is true and correct.

Executed: New York, NY

January 30, 2008

SCHWEITZER CORNMAN GROSS & BONDELL LLP
Attorneys for Plaintiff
292 Madison Avenue
19th Floor
New York, NY 10017
Telephone: (646) 424-0770
Facsimile: (646) 424-0880

By



Elliot W. Lipins (EL6151)

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2 **CERTIFICATE OF SERVICE**
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4 It is hereby certified that on January 30, 2008, a true copy of the
5 foregoing Motion to Admit Counsel Pro Hac Vice, Declaration of Elliot W.
6 Lipins in support thereof, and order for admission pro hac vice, has been
7 served by first class mail, postage prepaid, upon:
8

9 Raymond R. Castello, Esq.
10 Fish & Richardson P.C.
11 153 East 53rd Street, 52nd Floor
12 New York, New York 10022

13
14 By: 
15 Elliot W. Lipins
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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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|--|----------|----------------------------|
| THERAPY PRODUCTS, INC. | § | |
| d/b/a ERCHONIA MEDICAL | § | 07 CV 8696 ((DLC) |
| § | | |
| Plaintiff, | § | |
| v. | § | ORDER FOR ADMISSION |
| LIONEL BISSOON, M.D., | § | PRO HAC VICE ON |
| d/b/a MESOTHERAPIE & ESTETIK, | § | WRITTEN MOTION |
| MERIDIAN AMERICA MEDICALS, INC. | § | |
| MERIDIAN MEDICAL INC., and | § | |
| MERIDIAN CO., LTD. | § | [ECF Case] |
| § | | |
| Defendants. | § | |

Upon the motion of Elliot Lipins, attorney for Plaintiff Therapy Products, Inc. d/b/a Erchonia Medical, and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

James D. Petrucci
Mason & Petrucci
4900 Woodway, Suite 745
Houston, Texas 77056
Tel: (713) 840-9993
Fax: (713) 877-9100

Robert M. Mason
Mason & Petrucci
13601 Preston Rd., Ste. 402W
Dallas, Texas 75240
Tel: (972) 788-1500
Fax: (972) 788-1561

are admitted to practice pro hac vice as counsel for Plaintiff Therapy Products, Inc. d/b/a Erchonia Medical in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____, 2008
New York, NY

UNITED STATES DISTRICT JUDGE